



JONATHAN M. HERMAN
(212) 415-9247
herman.jonathan@dorsey.com

May 2, 2014

VIA ECF

The Honorable Denise L. Cote, U.S.D.J.
Southern District of New York
500 Pearl Street, Room 610
New York, New York 10007

Re: *James, et al. v. Penguin Group (USA) Inc., et al.*, No. 1:13-cv-02801 (DLC)

Dear Judge Cote:

In accordance with the Court's April 11, 2014 Order (Dkt. No. 51), as modified by the Endorsed Letter dated April 16, 2014 (Dkt. No. 54), we write on behalf of all parties to submit a proposed pretrial schedule, which is attached hereto as Exhibit A (the "Proposed Schedule").

The Proposed Schedule contains the parties' best estimate as to the time required to complete fact and expert discovery and class-certification briefing based on their recent productive and cooperative discussions. The parties request that the Court schedule a status conference in late July at which time the parties can address the status of discovery and whether any adjustments to the schedule are warranted.

Respectfully,

/s/ Jonathan M. Herman

Enclosure

cc: Plaintiffs' Counsel (via ECF)